

Reading File

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

970394
EC-2

DEC 01 1987

Phil Horning, Liberty Team Leader
Sierraville Ranger District
P.O. Box 95
Sierraville, CA 96126

Dear Mr. Horning:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the **Liberty** project. EPA's review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Liberty DEIS documents the analysis of two action alternatives designed to thin overstocked timber stands, remove dead and dying trees, create defensible fuel profile zones, treat fuels, improve the transportation system, and implement additional vegetation management actions as needed. Alternative B includes a proposal to enhance an aspen stand, while Alternative C provides for wider stream management zones and adds group selection as a harvest strategy. The third alternative, Alternative A, is a "no action" alternative as required by NEPA.

The Forest Service's analysis of environmental impacts which could potentially result from the action alternatives is excellent, and EPA commends the Forest Service on its efforts. However, we have rated this DEIS EC-2, Environmental Concerns--Insufficient Information, based on concerns involving threshold of concern (TOC) exceedences in three sub-watersheds and road management (see the enclosed "Summary of Rating Definitions and Follow-up Action" for an explanation of EPA's rating system). Our specific comments follow.

We appreciate the opportunity to review this DEIS. If you have any questions about this letter, please call Leonidas Payne of my staff at (415) 744-1571.

Sincerely,

A handwritten signature in dark ink, appearing to read "David J. Farrel".

David J. Farrel, Chief
Federal Activities Office

Specific Comments & Recommendations

Liberty DEIS Comments

Exceedence of Threshold of Concern (TOC)

Implementation of the DEIS preferred alternative (Alternative B) is expected to push 3 subwatersheds currently below the TOC to a point above the TOC. Although EPA recognizes that fuels reduction activities are necessary to reduce the threat of catastrophic wildfire, we are concerned that implementation of Alternative B will set up a situation in which cumulative watershed effects are likely to occur.

EPA has noted that the ID team considered additional alternatives to reduce TOC exceedences, but decided to eliminate these alternatives from further study since they were determined to be infeasible or incapable of meeting the project purpose and need. In developing these additional alternatives, the ID team considered dropping commercial thinning in subwatersheds I0404, I0405, and I0420; different equipment, and additional service contract work. However, EPA believes that additional strategies are available to minimize the TOC exceedences while still meeting project purpose and need, beyond implementation of the best management practices outlined in the DEIS. First, the ID team should consider obliteration of additional existing non-system roads, and perhaps existing system roads if such obliteration would be consistent with a long-term management strategy to move an area toward late seral conditions. Second, the ID team should consider an alternative which combines the SMZs outlined in Alternative C with the harvest proposal outlined in Alternative B.

The ID team is in the best position to determine whether either of the strategies outlined above could potentially minimize TOC exceedences while still meeting project purpose and need. With regard to the first suggestion regarding road obliteration, EPA requests that the Forest Service quantify the potential watershed benefit of obliterating each of the five non-system roads proposed to be added to the transportation system (see Road Management below), identify any system roads in subwatersheds I0404, I0405, and I0420 which may be redundant or inconsistent with long-range management goals, and quantify the potential watershed benefit of obliterating any such system roads. With regard to the second suggestion, EPA requests that the Forest Service update table 3.5.3 to show the ERA/TOC ratio of a hybrid "B with C SMZs" alternative.

It is unclear whether the information provided in Table 3.5.5 is the same for Alternatives B and C. Please confirm this in the FEIS.

Road Management

Considering the potential impacts of new road construction in Section 22 as outlined at page 3-38, is there any possibility that the area could be accessed in another manner or through the use of a different road alignment?

EPA has noted that five roads marked as non-system roads in the "Existing Roads Table" at

page B-2 are proposed to become system roads in the "Proposed Road Management Objectives Table" at page B-3. These roads are 07-10-05, 07-10-07, 07-10-07-10 (see also comment below), 301-40 Seg. I, and 301-85. Together, these roads account for the one mile discrepancy between the 4.4 miles of "non-system roads and wheeltracks" noted on Page 3-65 and the 3.4 miles of non-system roads marked for decommissioning at Page B-6. Not all of these roads are shown on the alternative maps provided with the DEIS, but it seems possible that all of these roads are located in subwatersheds I0404, I0405, and I0420 where there is a concern about cumulative watershed effects. In an attempt to minimize TOC exceedences (as discussed above), EPA strongly recommends that all of these roads be obliterated following the conclusion of management activities. The FEIS should provide information regarding the potential environmental benefits of obliterating each of these roads, expressed in terms of a reduction in the ERA/TOC ratio. Any decision to add any of these roads to the transportation system should be supported by information addressing why inclusion of these roads in the transportation outweighs the need to minimize cumulative watershed effects.

A 0.1 mile section of Road 07-10-07-10 is listed in the "Proposed Road Management Objectives Table" as a "local" road which will be "open." A 0.18 mile section of Road 07-10-07-10 is marked for decommissioning in the "Proposed Road Decommission Table" at page B-6. Please confirm that these are two different sections of the same road. If not, please state how this road will be managed in the FEIS.

Road 07-10-05 is shown as a temporary road on the alternatives map, yet it appears in the "Proposed Road Management Objectives Table" as a "local" road which will be "open." Please state how this road will be managed in the FEIS.

Roads 301-40 Seg. I and 301-85 do not appear on the alternatives map. Please identify these roads on the maps provided with the FEIS.

Please revise the alternatives maps to show all proposed road obliterations of non-temporary roads.

Page 3-57 of the DEIS states that "the total miles of road remaining within the analysis area after timber harvest needs are met is approximately 40.45 [miles]." This appears to be inconsistent with the figure at page B-1, which states that 52.7 miles of roads will remain after timber harvest. Please revise whichever figure is incorrect in the FEIS.

Page 3-65 states that "all of the roads on National Forest lands within the analysis boundary are either open to vehicles or have wheeltracks around the road closure structure." Page 3-66 states: "Gates and barricades through-out this area have been ineffective management tools for controlling or eliminating vehicular traffic where such traffic has been determined detrimental." Please outline all steps which the Forest Service has taken and intends to take to enforce road closures in the analysis area.